

From: [Kathy Seikel](#)  
To: [Russell Wasem](#)  
Cc: [Laura Parsons](#); [Lina Younes](#); [ljg5@psu.edu](#); [mag38@psu.edu](#); [Neil Anderson](#); [Maia Tatinclaux](#); [dll33@psu.edu](#)  
Subject: Re: Fw: Illegal Pesticides article and caller - AL DIA Article  
Date: 01/10/2012 11:26 AM  
Attachments: [IllegalPesticides-ALDia.pdf](#)  
[Fall11-5.pdf](#)  
[Rat poison 10-28-11.pdf](#)

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thanks, Rusty. When I worked in OPP we drew upon the AAPCC data to develop our pesticide poison prevention outreach materials.> As I recall, each year there are about 70,000 calls about exposure incidents involving kids (17 and under), roughly 12-15K of which involve rodenticides (and of those involving rodenticides the vast majority involve children under 6.

The Penn State folks who are copied on this email do tremendous amount of outreach and are part of a large network of IPM proponents that are working to get the word out on rodenticides so I am glad you are now in communication with them and know they will appreciate the feedback.

I showed them - and a few other colleagues - the rodenticide brochure you developed last fall and received some comments. I have comments as well. I think this brochure could be very useful but I think for it to be widely embraced as an outreach tool, it would need to be tweaked -- and vetted by stakeholders that work with the target audience for which this brochure was developed. Would you be open to that?

If so, I could distribute the revised brochure broadly with EPA grantees, healthy homes experts, etc. I participate on ASTHO (Amer Assoc of State and Territorial Health Officials) monthly calls as EPA's liaison for kids health issues, so this could be another outlet for the brochure.

Maia - I assume from Rusty's note that comments on the bilingual labeling FR are in. What are your next steps? inquiring minds want to know:-)



Kathy Seikel  
Environmental Protection Agency  
Office of the Administrator  
Office of Children's Health Protection (1107A)  
1200 Penna. Ave., NW  
Washington, DC 20460  
202-564-0457 (ph)  
202-564-2733 (fax)  
visit: [www.epa.gov/children](http://www.epa.gov/children)

▼ [Russell Wasem---01/10/2012 11:00:49 AM---Hello Kathy, I have read the both articles and think they are pretty good, except that neither artic](#)

From: Russell Wasem/DC/USEPA/US  
To: Kathy Seikel/DC/USEPA/US@EPA

Cc: Laura Parsons/DC/USEPA/US@EPA, Lina Younes/DC/USEPA/US@EPA, ljg5@psu.edu, mag38@psu.edu, Neil Anderson/DC/USEPA/US@EPA, Maia Tatinclaux/DC/USEPA/US@EPA  
Date: 01/10/2012 11:00 AM  
Subject: Re: Fw: Illegal Pesticides article and caller - AL DIA Article

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Hello Kathy,

I have read the both articles and think they are pretty good, except that neither article mentions bait stations. Bait stations, in combination with a prohibition of pelleted products on homeowner market, is the key mitigation measure for preventing child/pet/wildlife access and this should be added to any future communications. Products marketed to residential consumers will be required to be packaged with following the completion of our cancellation proceedings. There are currently homeowner products on the market right now that are sold with bait stations and we want to encourage homeowners, especially those with children and pets, to utilize rodenticide products that are packaged with a bait station.

Also relevant to both documents. I asked my colleagues who conducted the human incidents about "Nationally, rodenticides account for 85 percent of calls to the Poison Control Center due to pesticide poisonings in the U.S. for children under age six." I have never fully understood this statistic as it has been presented in our documents and have asked that they comment on its accuracy and context. Apparently, both articles have used this statistic incorrectly. It should be 85% of the rodenticide calls to PCCs are concerning exposures to children <6 years old. Rodenticides do not account for 85% of the total calls to PCCs.

In the PA IPM 2nd paragraph, which characterizes EPA actions and rodenticides, I have issues with the first two sentences. "...Environmental Protection Agency announced its plans to ban the sale of some popular household mouse and rat poisons ~~along with most bait and pellet products~~. Since rodenticides are pesticides designed to kill mammals ~~by thinning blood~~, they can pose a special risk for accidental poisoning of humans and their pets. In addition, rodenticides in pellet form are especially risky for children." I have struck through and redlined the parts that are not correct as all rodenticide products on the homeowner market are bait products and one of the chemicals that will be permitted to be used in homeowner bait products (bromethalin) is a neurotoxicant, not an anticoagulant. I think deleting what I have struck-through is the easiest way to address these points. Though with the first sentence, we do intend to ban the sale of pelleted rodenticide products and loose bait rodenticide products not packaged with a baitstation on the homeowner market.

As far as including the products we are proposing to cancel, this information is on the epa website (<http://www.epa.gov/pesticides/mice-and-rats/cancellation-process.html>), the approved homeowner products are also on the website (<http://www.epa.gov/pesticides/mice-and->

rats/rodent-bait-station.html).

Regarding the spanish labeling. I spoke to Maia and she informed me there was a comment period on the Agency's receipt of a "petition"-like request to mandate spanish labeling. This comment period only informed the public of receipt of "petition"-like request and solicited ideas for proceeding in the rule direction. This was not a proposed rule and currently we are still evaluating options.

Thank you again for all your input, suggestions, and efforts on this so far. Please do not hesitate to let me know if you (or others) require any clarification from me on this book of an email.

Best,

Rusty\_\_\_\_\_

Rusty Wasem / Chemical Review Manager  
Risk Management & Implementation Branch 1\*  
Pesticide Re-evaluation Division\* / Office of Pesticide Programs  
703 / 305 6979

▼ Kathy Seikel---01/04/2012 08:10:30 AM---Dear Laura and Rusty - Happy new year! I hope you both enjoyed a great holiday break. I am writing

From: Kathy Seikel/DC/USEPA/US  
To: Laura Parsons/DC/USEPA/US@EPA, Russell Wasem/DC/USEPA/US@EPA  
Cc: mag38@psu.edu, ljg5@psu.edu, Lina Younes/DC/USEPA/US@EPA  
Date: 01/04/2012 08:10 AM  
Subject: Fw: Illegal Pesticides article and caller - AL DIA Article

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Dear Laura and Rusty -

Happy new year! I hope you both enjoyed a great holiday break. I am writing to follow up on our conversation about how OCHP can help get the word out about rodenticide exposure risks, Please see the email and attached articles below, which were written by one of our grantees, the Philadelphia School and Community IPM Center (out of Penn State University). They are doing yeoman work reaching out to at-risk communities - including low income Latinos who are at higher risk because of their inability to read product labels (much less hear about EPA's latest actions on rodenticides, which are more likely to be reported in the English mass media than in Sp media outlets). I think we should build on the work Penn State is doing to develop the broader outreach campaign that you have asked OCHP to support.

Please take a look at what Maria and her colleagues have written and let me know if there is anything you would like her to add --specifically with regard to the products that you are attempting to cancel -- so she can add that to her messaging for future in person talks and media interviews...(Maria and I can help translate the Sp portions if you cannot understand them as written)....I'd like to use these articles